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19 Attorneys for Defendants Hikma Labs Inc.,
20 Hikma Pharmaceuticals USA Inc., Roxane
21 Laboratories, Inc., West-Ward Pharmaceuticals
22 Corp.

23 IN THE UNITED STATES DISTRICT COURT

24 FOR THE NORTHERN DISTRICT OF CALIFORNIA

25 SAN FRANCISCO DIVISION

26 THE CITY OF PROVIDENCE, RHODE
27 ISLAND, on behalf of itself and all others
28 similarly situated,

15 Plaintiffs,

16 v.

17 JAZZ PHARMACEUTICALS PLC;
18 ROXANE LABORATORIES, INC.; WEST-
19 WARD PHARMACEUTICALS CORP.;
20 HIKMA LABS INC.; HIKMA
21 PHARMACEUTICALS USA INC.; and
22 HIKMA PHARMACEUTICALS PLC,

23 Defendants.

24 Case No. 3:20-cv-04064-LB

25 **JOINT STIPULATION TO EXTEND
26 DEADLINE TO ANSWER OR
27 OTHERWISE RESPOND TO THE
28 COMPLAINT**

29 Ctrm: B – 15th Floor
30 Judge: Magistrate Judge Laurel Beeler

1 Defendants Hikma Pharmaceuticals USA Inc., Hikma Labs Inc., Roxane Laboratories, Inc.,
2 and West-Ward Pharmaceuticals Corp. (collectively “Hikma Defendants”)¹ together with Plaintiff
3 The City of Providence Rhode Island, by and through counsel, enter into this Stipulation pursuant to
4 Civil Local Rule 6-1(a):

5 WHEREAS, the Complaint in the above-captioned matter was filed on June 18, 2020 (ECF
6 No. 1);

7 WHEREAS, the Hikma Defendants’ response to the Complaint is currently due on July 15,
8 2020. The parties have not previously requested any extensions of time to respond to the Complaint;

9 WHEREAS the parties agree that additional time is appropriate for the Hikma Defendants to
10 respond to the Complaint;

11 WHEREAS related cases asserting claims and allegations similar to those asserted here have
12 been filed in this Court and at least one other federal District Court, and extending the Defendants’
13 time to respond would facilitate the coordination and early scheduling of this matter with the related
14 cases;

15 WHEREAS this extension will not alter or otherwise impact the date of any event or deadline
16 already fixed by Court order;

17 **THE PARTIES HEREBY STIPULATE AND AGREE**

18 1. That the deadline for the Hikma Defendants to answer or otherwise respond to the
19 Complaint is extended 45 days to August 31, 2020;

20 2. That this agreement shall not be deemed a waiver by any of the Hikma Defendants of
21 personal jurisdiction or any other defense, in this or any other case.

22 **IT IS SO STIPULATED.**

23
24 Dated: July 15, 2020

Respectfully submitted,

25
26 WHITE & CASE LLP

27 By: /s/ Heather M. Burke
Heather M. Burke (SBN 284100)

28
1 Hikma Pharmaceuticals plc has not been served with the Complaint and is not participating in this
Stipulation.

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25 *Attorneys for Defendants Hikma Labs Inc., Hikma
26 Pharmaceuticals USA Inc., Roxane Laboratories,
27 Inc., West-Ward Pharmaceuticals Corp.*
28

16 Dated: July 15, 2020

17 WESTERMAN LAW CORP.
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19 By: /s/ Michael M. Buchman
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36 *Attorneys for Plaintiff The City of Providence,
37 Rhode Island, and the Proposed Class*
38

FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Heather M. Burke, attest that concurrence in the filing of this document has been obtained.

Executed: July 15, 2020

/s/

Heather M. Burke

Heather M. Burke

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2020, the within documents were filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to the attorneys of record in this case.

Executed: July 15, 2020

/s/

Heather M. Burke
Heather M. Burke